

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: :  
EARLE STANLEY GREER : Bankruptcy No. 18-18146ELF  
Debtor : Chapter 11  
:

**ORDER**

AND NOW, this                   day of                   , 2019, after hearing, the Trustee's Motion to Dismiss is Denied. Debtor is hereby allowed to continue his case as a Chapter 11 debtor.

FOR THE COURT:

---

Hon. Eric L. Frank, B.J.

Interested parties:

Dave P. Adams  
Office of the United States Trustee  
200 Chestnut Street, Suite 502  
Philadelphia, PA 19106  
215 597-4411  
215 923-1293 (fax)  
Dave.p.adams@usdoj.gov

Earle Stanley Greer  
3 Carriage Lane  
Lansdowne, PA 19050

Valerie A. Hibbert, Esquire  
18 North Lansdowne Avenue  
Lansdowne, PA 19050  
Telephone: 610.622.3660  
vah963@gmail.com  
*Counsel for the Debtor*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

---

In re: :  
:   
EARLE STANLEY GREER, : Bankruptcy No. 18-18146ELF  
: Chapter 11  
Debtor. : **HEARING TO BE HELD**  
: Date: October 23, 2019  
: Time: 11:00 a.m.  
: Place: Courtroom #1

---

**DEBTOR'S ANSWER TO TRUSTEE'S MOTION TO DISMISS OR CONVERT TO**  
**CHAPTER 7**

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania, Debtor answers as follows:

1. Thru 3. Admitted, however it must be noted that Debtor is filing this date his Motion seeking a conditional Order, his disclosure statement and his plan.
4. The Debtor is in the process of filing all due monthly operating reports including the one for September 2019, which is included as an exhibit to his disclosure statement.
5. Debtor is fully committed to following through and fulfilling his obligations pursuant to this bankruptcy case.

WHEREFORE, Debtor respectfully requests that he be allowed to continue in this Bankruptcy as a Chapter 11 debtor.

Respectfully submitted,

*Valerie A. Hibbert, Esq.*

Date: October 1, 2019

---

Valerie A. Hibbert, Esquire  
18 North Lansdowne Avenue  
Lansdowne, PA 19050  
Telephone: 610.622.3660  
vah963@gmail.com  
*Counsel for the Debtor*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

---

In re:	:	
	:	
EARLE STANLEY GREER	:	Bankruptcy No. 18-18146ELF
	:	Chapter 11
Debtor	:	
	:	

---

**CERTIFICATE OF SERVICE**

I, Valerie A. Hibbert, Esq., do hereby certify that true and correct copies of Debtor's Answer to Trustee's Motion to Dismiss has been served this 1st day of October 2019 by first class mail upon those listed below:

Dave P. Adams  
Office of the United States Trustee  
200 Chestnut Street, Suite 502  
Philadelphia, Pennsylvania 19106

*Valerie A. Hibbert, Esq.*

---

Valerie A. Hibbert, Esq.  
Attorney for Debtor